Rural Health Clinics – RHC Teleconference

Survey and Certification Presented by Michael Johnson RN, MSW Program Manager, Facilities, Services and Licensing Department of Health March 1, 2006

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Prior to Survey

- Provider works with the Office of Rural Health (DOH) to meet RHC requirements.
 - Step # 1 Establish initial eligibility.
 - Step # 2 Prepare for on-site survey
- Phone: 360-236-2811
- www.doh.wa.gov/hsqa/ocrh
- Fax: 360-664-9273

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Appendix G and Survey Booklet

To view and download survey material go to: http://www.cms.hhs.gov/manuals/

- 42 CFR 491 Rural Health Clinics
- Appendix G
- CMS Form 30 Survey Booklet

Survey Preparation

- Once the Office of Rural Health determines all requirements have been met, they transfer the provider file to Survey and Certification (DOH – Facilities, Services and Licensing)
- A surveyor is assigned
- The provider is contacted to determine "readiness" for survey
- If ready, an initial survey is scheduled

What is "readiness"

 Provider must assure they are ready to meet all the Rural Health Clinic Conditions of Participation (COPs) – 42
 CFR 491 – Rural Health Clincs

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Surveyor will review the following with the provider prior to scheduling the initial survey

- Review on-site survey criteria including: Appendix G - Rural Health Clinics (Conditions of Participation and Interpretive guidelines) and Rural Health Clinic Survey Report (Conditions of Participation – CMS 30)
- Employ a medical director available to provide patient care at least once in every two-week period.

Survey Preparation (cont)

- Employ a mid-level practitioner (nurse practitioner, certified nurse midwife or physician assistant) to provide care at least 50% of the time the clinic is open.
- Identify an individual in the clinic who is responsible to assure that all the Medicare Conditions of Participation are met as outlined in the <u>Rural Health Clinic Survey</u> <u>Report</u>. This designated individual should be thoroughly versed in all of the RHC Conditions of Participation and all aspects of clinic services.

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Survey Preparation (cont)

- Develop a RHC manual that includes all required policies, procedures and protocols as outlined in the Rural Health Clinic Survey Report.
- Develop written job descriptions for the physicians and mid-level practitioners. Be sure the job descriptions include responsibilities for policy and procedure development and participation in program evaluation activities.

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Survey Preparation (cont)

- Review all employee file information for evidence of current licensure and other required certification and training required by Medicare Conditions of Participation and clinic policy.
- Determine if the clinic's physical plant and environment meet all federal, state and local safety and maintenance requirements as outlined in the Rural Health Clinic Survey Report. This includes medication management systems, fire & safety codes, physical plant maintenance, storage of cleaning supplies, patient care equipment calibration & maintenance, etc.

Survey Preparation (cont)

- Assure the clinic is able to provide all six required lab tests on the clinic's premises. Obtain appropriate CLIA waiver. (contact Department of Health, Laboratory Quality Assurance, 206-361-2802)
- Develop a written plan to implement an annual program evaluation or quality improvement program that meets the requirements outlined in the Rural Health Clinic Survey Report (CMS Form 30).
- Make all necessary changes to assure the clinic meets all of Conditions of Participation as identified in the Rural Health Clinic Survey Report.

On-site survey

- Your assigned surveyor will be in contact with you to verify that you consider the clinic meets all of the Medicare Conditions of Participation and to schedule the on-site survey including a tour of the facility.
- If you have not been provided with the contact number for a surveyor please call 360-236-2917.
- During the on-site survey you will be asked to complete and sign or resign previously submitted

 - Request to Establish Eligibility CMS 29
 Health Insurance Benefits Agreement CMS 1561A
- The clinic should maintain a file of all correspondence related to the RHC application and survey process

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On-site Survey

- The surveyor will:
 - Tour the facility for compliance with health and safety, equipment maintenance etc.
 - Review policies and procedures
 - Review patient health and personnel records
 - Interview staff
 - Review plan for program evaluation

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Post Survey

- Upon completion of the on-site survey your clinic will receive a written report indicating if the clinic meets all the Conditions of Participation and a recommendation that the clinic be approved to participate in the Medicare RHC program.
- If the clinic is found to have any deficiencies corrections must be made before the clinic is recommended for approval.
 - NOTE: If the clinic does not meet <u>one</u> or more of the Medicare Conditions of Participation the clinic cannot be certified. You will be given an opportunity to resolve these deficiencies within a reasonable amount of time before being surveyed again.

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Post Survey (cont)

- Survey information is forwarded to CMS Region X office in Seattle by FSL with a recommendation for approval to participate in the Medicare Rural Health Program. CMS is responsible for the final certification decision.
- CMS Region X office will notify the clinic of approval status, the clinic's Medicare provider number and effective date. That office may be contacted at: (206) 615-2321.
- After receiving the provider number, the clinic contacts the fiscal intermediary (FI) regarding billing instructions.
- The Department of Health FSL will make periodic unannounced inspections to assure the clinic continues to meet all Medicare Conditions of Participation.

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Survey Contacts:

- Facilities, Services and Licensing (Dept of Health (360) 236-2905
- Raejean Bales (360) 236-2917 (responsible for assuring all requirements met for survey assignment)
- Michael Johnson: (206) 366-2638 michael.johnson@doh.wa.gov
- Sandy Ryan: (206) 729-3341 sandy.ryan@doh.wa.gov